

FILED

AUG 30 2022

CLERK U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIA

1544

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)

v.)

BERNARD WASHINGTON)

Criminal No. 2:22-cr-222
(18 U.S.C. §§ 2, 371, 2312, 2313)

[UNDER SEAL]

INDICTMENT

COUNT ONE

The grand jury charges:

THE CONSPIRACY AND ITS OBJECTS

1. From on or about May 30, 2021, and continuing thereafter until on or about October 25, 2021, in the Western District of Pennsylvania and elsewhere, the defendant, BERNARD WASHINGTON, knowingly and willfully did conspire, combine, confederate, and agree with others known and unknown to the grand jury, to commit offenses against the United States, that is:

a) Transportation of stolen vehicles, in violation of Title 18, United States Code, Section 2312; and

b) Receipt of stolen vehicles, in violation of Title 18, United States Code, Section 2313.

MANNER AND MEANS OF THE CONSPIRACY

2. It was a part of the conspiracy that in and around May 2021, the defendant, BERNARD WASHINGTON, began working for a business that provided services to a rental car company known to the grand jury as Company A.

3. It was further a part of the conspiracy that the defendant, BERNARD WASHINGTON, and co-conspirators known to the grand jury, accessed the storage lot of Company A located in the Western District of Pennsylvania and drove vehicles from the storage lot to other locations, including to locations within and outside the Western District of Pennsylvania, without the authorization or consent of Company A.

4. It was further a part of the conspiracy that the defendant, BERNARD WASHINGTON, and co-conspirators known to the grand jury, provided said stolen vehicles to associates known and unknown to the grand jury in exchange for payment.

5. It was further a part of the conspiracy that the defendant, BERNARD WASHINGTON, and co-conspirators known to the grand jury, transported vehicles stolen from Company A's storage lot located in the Western District of Pennsylvania across state boundaries to other states, including to Maryland, and in interstate commerce.

6. It was further a part of the conspiracy that the defendant, BERNARD WASHINGTON, received vehicles in the Western District of Pennsylvania from co-conspirators known to the grand jury that he knew were stolen, including at least one vehicle that crossed a state boundary after being stolen.

OVERT ACTS

7. In furtherance of the conspiracy, and to affect the objects of the conspiracy, the defendant, BERNARD WASHINGTON, and co-conspirators known and unknown to the grand jury, did commit and cause to be committed, the following overt acts, among others, in the Western District of Pennsylvania and elsewhere on or about the following dates:

8. Between on or about May 30, 2021, to on or about October 25, 2021, the defendant, BERNARD WASHINGTON, and co-conspirators known to the grand jury, transported a stolen

vehicle, that is, a 2021 Black Buick Encore, bearing VIN KL4MMGSLXMB151373, from Company A's storage lot, located in the Western District of Pennsylvania, to Fairfax, Virginia.

9. Between on or about September 12, 2021, to on or about October 20, 2021, the defendant, BERNARD WASHINGTON, and co-conspirators known to the grand jury, transported a stolen vehicle, that is, a 2020 Chevrolet Suburban bearing VIN 1GNSKHKC9LR274149, from Company A's storage lot, located in the Western District of Pennsylvania, to Prince Georges County, Maryland.

10. Between on or about June 6, 2021, to on or about September 16, 2021, the defendant, BERNARD WASHINGTON, received a stolen vehicle, that is, a 2020 Dodge Challenger bearing Vehicle Identification Number (VIN): 2C3CDZBT5LH129255, from a co-conspirator known to the grand jury, that he knew had been stolen and that had crossed state boundaries after it was stolen.

In violation of Title 18, United States Code, Section 371.

COUNT TWO

The grand jury further charges:

From on or about May 30, 2021, to on or about October 25, 2021, in the Western District of Pennsylvania and elsewhere, defendant BERNARD WASHINGTON did unlawfully transport in interstate commerce a stolen motor vehicle, namely, a 2021 Black Buick Encore, bearing VIN KL4MMGSLXMB151373, which defendant BERNARD WASHINGTON knew to have been stolen.

In violation of Title 18, United States Code, Sections 2312 and 2.

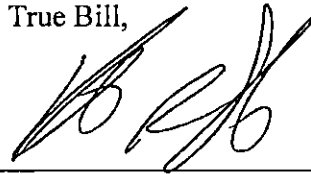
COUNT THREE

The grand jury further charges:

Between on or about June 6, 2021, to on or about September 16, 2021, in the Western District of Pennsylvania and elsewhere, defendant BERNARD WASHINGTON did unlawfully receive a motor vehicle which had crossed a state boundary after being stolen, namely, a 2020 Dodge Challenger, bearing VIN 2C3CDZBT3LH125186, which defendant BERNARD WASHINGTON knew to have been stolen.

In violation of Title 18, United States Code, Sections 2313 and 2.

A True Bill,



Foreperson



CINDY K. CHUNG
United States Attorney
PA ID No. 317227



KAREN GAL-OR
Assistant United States Attorney
PA ID No. 317258